

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

**TO BE FILED
UNDER SEAL**

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 SECURITY INSURANCE COMPANY OF HARTFORD
 (for Itself and as Successor in Interest to
 the Fire and Casualty Insurance Company of Connecticut
 and the Connecticut Indemnity Company),

Petitioner,

-against-

COMMERCIAL RISK REINSURANCE COMPANY
 LIMITED (BERMUDA) and COMMERCIAL RISK RE-
 INSURANCE COMPANY (VERMONT),

Respondents.

: Docket No. _____

: **NOTICE OF
RELATED CASE**

Pursuant to Local Rule 1.6(a), attorneys for Petitioner Security Insurance Company of Hartford, for itself and as successor in interest to the Fire and Casualty Insurance Company of Connecticut and the Connecticut Indemnity Company, ("SICH") hereby give notice that the instant proceeding (the "Petition to Confirm"), filed under seal, is related to the following case currently pending before this Court (the "Related Case"):

**Commercial Risk Reinsurance Co. Ltd. et al. v. Security Ins. Co. of Hartford,
Case No. 07-CV-2772 (Judge Victor Marrero)**

The instant Petition to Confirm is also related to the following case that was recently pending before this Court (the "Prior Related Case") and arose out of the same arbitration as the Petition to Confirm:

**Security Ins. Co. of Hartford v. Commercial Risk Reinsurance Co. Ltd. et al.,
Case No. 07-CV-3277(Judge Victor Marrero) appeal docketed ABC v. DEF, No. 07-
2440-cv (2d Cir. docketed June 13, 2007)**

The Petition to Confirm, the Prior Related Case, and the Related Case all involve the same parties. The Petition to Confirm, the Prior Related Case, and the Related Case have overlapping issues relating to two arbitrations arising out of reinsurance contracts between the Petitioner here (Respondent in the Related Case and Petitioner in the Prior Related Case) and Respondents here (Petitioners in the Related Case and Respondents in the Prior Related Case). The first of the two arbitration proceedings led to the Related Case, which is before Judge Marrero on companion Petitions to Confirm and to Vacate, and the second of the two arbitrations led to the Prior Related Case and the instant Petition to Confirm.

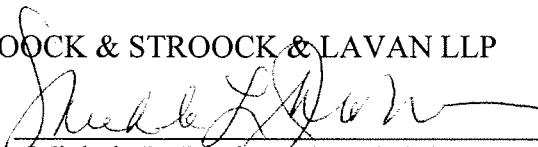
For convenience, the arbitration underlying the Prior Related Case and the instant Petition to Confirm has, for over a year, been referred to by the parties as the “Non-DIG Arbitration” to distinguish it from the arbitration underlying the Related Case. The instant Petition to Confirm seeks confirmation of the Award issued in the Non-DIG Arbitration following a hearing that SICH was forced to seek court intervention to compel by filing the Prior Related Case because Respondents refused to proceed. Respondents’ refusal to proceed with the Non-DIG Arbitration hearing may have been precipitated by an adverse ruling in the arbitration underlying the Related Case. Upon information and belief, Respondents will likely raise as defenses to confirmation of the Award certain of the very same defenses that it raised in the Related Case.

Pursuant to a confidentiality agreement, the instant Petition to Confirm is being filed under seal. Pursuant to the exact same agreement, the Prior Related Case, currently on appeal in the Second Circuit, was also filed under seal. Under an identical confidentiality agreement between the parties, the Related Case was also filed, and is pending, under seal. Both the Related Case and the Prior Related Case were assigned to Judge Marrero.

Petitioner provides this notice of relevant facts to assist in a determination that the instant Petition to Confirm should be heard by Judge Victor Marrero, who is presiding over the Related Case, and who presided over the Prior Related Case, so as to avoid unnecessary duplication of judicial effort, to avoid complications related to the filing of separate but similar matters under seal pursuant to two identical confidentiality agreements, and for convenience of the Court and the parties.

Dated: New York, New York
August 10, 2007

STROOCK & STROOCK & LAVAN LLP

By: 

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